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BEFORE THE
Federal Communications Commission

WASHINGTON, D.C.

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JAN 24 1997

In the Matter of

Advanced Television Systems
and Their Impact Upon the
Existing Television Broadcast
Service

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

MM Docket No. 87-268

To: The Commission

REPLY COMMENTS OF MACON URBAN MINISTRIES, INC.
d/b/a GOOD NEWS TELEVISION

MACON URBAN MINISTRIES, INC. d/b/a Good News Television, (hereinafter referred to as "GNTV"), licensee of WGNM(TV), Channel 64, Macon, Georgia, by its counsel, hereby respectfully submits these Reply Comments in the proceeding, Sixth Further Notice of Proposed Rulemaking, 11 FCC Rcd 1068 (1996) ("NPRM"). Comments were filed in this proceeding on November 22, 1996. The Commission extended the time for parties to file Reply Comments until January 24, 1997.

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Specifically, GNTV replies to the Comments filed by the Association of Maximum Service Telecasters, Inc. ("Broadcasters Caucus")¹. The Broadcasters Caucus submitted an alternative Digital Television Table of Allotments ("Caucus DTV Table") to the Commission's proposed DTV Table ("FCC DTV Table") in its Comments, filed November 22, 1996.

WHEREFORE, the following is stated:

1. GNTV is the licensee of WGNM(TV), Channel 64, Macon, Georgia. WGNM(TV) currently operates on Channel 64 with an effective radiated power ("ERP") of 51.3 kilowatts with an antenna height of 185.0 meters Height Above Average Terrain ("HAAT"). The FCC DTV Table proposed by the Commission in its NPRM would allow GNTV to operate on Channel 14 with an effective radiated power of 50 kilowatts at its current HAAT of 185.0 meters. The Caucus DTV Table proposed in its Comments would allow GNTV to operate on Channel 35 with an effective radiated power of only 0.3 kilowatts at HAAT of 182.8 meters.

2. GNTV gave notice by letter, dated November 18, 1996, to Victor Tawil, Association of Maximum Service Telecasters, Inc. ("MST") that the Caucus DTV Table proposal for WGNM(TV) was unacceptable. GNTV also formally requested maximization of the effective radiated power and coverage area for WGNM(TV) in the Caucus DTV Table and further requested the most optimal channel to achieve maximization of its effective radiated power and coverage area. GNTV's request is duly noted in the Appendix to the Broadcasters Caucus'

¹ GNTV was not a signatory to the Comments filed by the Broadcasters Caucus.

Comments, as are the letters of numerous other television stations requesting maximization under the Caucus DTV Table.

3. In its Comments, GNTV stated that the proposed allotment for WGNM(TV) in the FCC DTV Table would be inadequate to provide service to the Macon community. GNTV believes a facility allowing GNTV to operate digitally at up to 500 kilowatts ERP with an HAAT of 300 meters would realistically accommodate for the existing facility and allow for reasonable future service enhancements as DTV becomes more viable. See, GNTV Comments, pg.1 and attached Statement of Louis R. du Treil, Sr., Registered Professional Engineer ("Engineering Statement").

4. GNTV believes the proposed allotment in the Caucus DTV Table is woefully inadequate to provide a meaningful level of service to Macon as the growing population base of the area continues to expand and as community coverage requirements increase. Please see attached Engineering Statement. The proposed power level of only 0.3 kilowatts would effectively reduce WGNM(TV) to a mere low power television station unable to compete in the new DTV market.

5. The extremely low power level proposed for WGNM(TV) in the Caucus DTV Table would cause severe economic harm to GNTV. The allotment of only 0.3 kilowatts of power would have a serious, detrimental effect on the community of Macon, Georgia and the surrounding area, since GNTV has always broadcast local programming responsive to the

community, especially to youth.

6. GNTV is very concerned with the very large disparity in power proposed in each DTV Table. In the FCC DTV Table, the power ranges from 3044 kilowatts to 50 kilowatts, a ratio of 61 to 1. The power ranges in the Caucus DTV Table have a ratio of 145 to 1, from 43.6 kilowatts of the highest to 0.3 kilowatts at the lowest. The use of extremely high power by some DTV stations in the UHF band may result in intermodulation problems to receivers, including the possibility that an intermodulation product(s) may interfere with a DTV channel of another station. See Engineering Statement, pg. 2.


7. As GNTV stated in its Comments, any DTV Table proposal that would so impair WGNM(TV)'s future growth as to hinder its very active community service commitment would clearly not be in the public interest. The proposed DTV assignment for WGNM(TV) in the Caucus DTV Table would limit GNTV's ability to continue its expansion to achieve its full potential to serve central Georgia and jeopardizes its ability to continue its tradition of building communication bridges in central Georgia.

WHEREFORE, the foregoing Reply Comments of Good News Television are submitted and the Commission is requested to: 1) Review and reassess the methodology employed in its development of the FCC DTV Table and Caucus DTV Table to allow for maximization of future digital television facilities for existing (NTSC) broadcasters, and; 2) Find the proposed the proposed allotment for WGNM(TV) in the DTV is unacceptable and modify it accordingly, if

the Commission adopts the Caucus DTV Table, and 3) Revise the proposed FCC DTV Table with respect to the DTV facilities being proposed for existing Channel 64 (DTV Channel 14), Macon, Georgia. Specifically, the parameters for DTV Channel 14, Macon, Georgia, should be enhanced to an effective radiated power of up to 500 kilowatts and height above average terrain of 300 meters.

Respectfully Submitted,

MACON URBAN MINISTRIES, INC.
d/b/a GOOD NEWS TELEVISION

By: 

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January 24, 1996



TECHNICAL STATEMENT IN SUPPORT OF
REPLY COMMENTS OF
GOOD NEW TELEVISION
MACON, GEORGIA

This statement has been prepared on behalf of Good News Television, licensee of station WGNM Macon, Georgia in support of reply comments in *The Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, MM Docket No. 87-268.

As stated in its comments, Good News is planning a substantial improvement in the facilities of WGNM and is concerned that the proposed DTV facilities will be inadequate to replicate the coverage of the improved station. In the Sixth Further Notice, the Federal Communications Commission proposes to allot DTV channel 14 with effective radiated power (ERP) of 50 kilowatts with antenna height above average terrain (HAAT) of 185 meters. Good News feels that this facility is inadequate and would prefer a facility having ERP of at least 500 kilowatts with HAAT of 300 meters. This later facility would be sufficient to replicate planned coverage and to provide for an additional increase in the future.

In comments, MSTV/"Broadcasters Caucus" proposes a revised allocation table to the FCC, and for WGNM,



facilities of 0.3 kilowatts ERP and 182.2 meters (HAAT) on channel 35 are proposed. These facilities are woefully inadequate to fulfill the coverage objectives of the station.

A very large disparity in power is proposed for the Macon, Georgia stations in the Sixth Further Notice. The proposed DTV power ranges from 3044 to 50 kilowatts, a ratio of 61 to 1. The MSTV proposal is even more startling, as the power ranges from 43.6 kilowatts to 0.3 kilowatt, a ratio of 145 to 1. Such huge difference in power will result in receiving difficulties for the low power station, in this case, WGNM.

Good News is also concerned that the use of extremely high power by some UHF stations may result in intermodulation problems in receivers. In several cities, where high power VHF and UHF stations are nearly collocated, it is possible for these stations to effectively overload the "front-ends" of consumer receivers, especially those connected to an outdoor antenna, with the result being receiver-induced intermodulation between two or more channels. The resulting intermodulation product(s) fall in the channel of a another station. This type of interference can be eliminated, but requires attenuation of the high signal levels with use of filters or attenuators; however, it is impractical to treat all affected receivers.

du Treil, Lundin & Rackley, Inc.

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Macon, Georgia

Page 3



Good News renews its request for DTV facilities which will replicate the intended coverage of WGNM and provide for future improvement. It is also requested that the huge power difference between stations be addressed in light of potential receiving problems.

A handwritten signature in cursive script that reads "Louis R. du Treil".

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January 21, 1997

CERTIFICATE OF SERVICE

I, Valerie M. Nealey, a secretary in the law firm of Allen & Harold, P.L.C., hereby certify that I have this 24th day of January 1997, caused to be delivered via 1st Class Mail, postage prepaid, copies of the foregoing "Reply Comments of Macon Urban Ministries, Inc. d/b/a Good News Television", to the following:

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